

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
Lynchburg Division**

<b>ELLENOR ZINSKI,</b>	)	
	)	
<b>Plaintiff,</b>	)	
	)	
<b>v.</b>	)	<b>Case No. <u>6:24-cv-41-NKM</u></b>
	)	
<b>LIBERTY UNIVERSITY, INC.,</b>	)	
	)	
<b>Defendant.</b>	)	

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**DEFENDANT LIBERTY UNIVERSITY’S MOTION TO STAY DISCOVERY  
PENDING ADJUDICATION OF ITS MOTION TO DISMISS**

Pursuant to Fed. R. Civ. P. 26(c)(1), Defendant, Liberty University, Inc. (“Liberty University”), hereby moves the Court to issue a protective order staying discovery pending this Court’s adjudication of its *sub judice* motion to dismiss Plaintiff’s Complaint in its entirety. (Dkt. 11.) Liberty University’s grounds for the requested relief are more fully set forth in the accompanying Memorandum of Law, filed simultaneously herewith.

Respectfully submitted,

/s/ Daniel J. Schmid  
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**CERTIFICATION PURSUANT TO FED. R. CIV. P. 26(c)(1)**

I hereby certify that I have conferred with Plaintiff's counsel in good faith in an effort to resolve the dispute regarding a stay of discovery without seeking the Court's intervention. The parties were unable to reach an agreement, thereby necessitating the filing of this motion.

/s/ Daniel J. Schmid

Daniel J. Schmid

**CERTIFICATE OF SERVICE**

I hereby certify that on this 8th day of November, 2024, I caused a true and correct copy of the foregoing to be electronically filed with this Court. Service will be effectuated on all counsel of record via this Court's ECF/electronic notification system.

/s/ Daniel J. Schmid

Daniel J. Schmid